



Village of Bourbonnais POLICE DEPARTMENT

700 Main Street NW • Bourbonnais Illinois 60914

Telephone: (815) 802-5330

Fax: (815) 933-3318

DAVID MOREFIELD
CHIEF OF POLICE

March 9, 2026

Stan Gromer

mallclerks@gmail.com

Mr. Gromer,

Thank you for writing the Village of Bourbonnais with your request for information pursuant to the Illinois Freedom of Information Act, ILCS 140/1 et seq.

On your request received February 23, 2026, you requested the following:

Dear FOIA Officer,

Pursuant to the Illinois Freedom of Information Act (5 ILCS 140/1 et seq.), I am requesting the following

records from the Village of Bourbonnais and the Bourbonnais Police Department:

1. ALPR/Flock Safety Usage Policy

A copy of the Bourbonnais Police Department's current policy governing the use of its automated license plate reader (ALPR) system, including any Flock Safety-specific operating procedures, authorized use guidelines, access controls, and audit requirements.

2. Flock Safety Contract and Agreements

A complete copy of the current contract or agreement between the Village of Bourbonnais (or the Bourbonnais Police Department) and Flock Safety, Inc., including all exhibits, amendments, addenda, statements of work, and any data retention, data-sharing, data ownership, or data destruction provisions.

3. Data-Sharing Agreements and Network Participation A list of all law enforcement agencies with whom the Bourbonnais Police Department currently shares ALPR/Flock data (also referred to in the Flock system as "Networks that



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I'm sharing"), and all agencies from whom the Department receives or can access ALPR/Flock data.

4. Data Retention Period

Records identifying the Department's current data retention period setting for ALPR captures (i.e., how many days of data are retained before automatic purge), including any configuration documentation or correspondence with Flock Safety regarding retention settings.

5. Cost and Payment Records *All invoices, purchase orders, and payment records between the Village of Bourbonnais and Flock Safety, Inc. for the current and prior fiscal year.*

6. Secretary of State ALPR Audit Records *Any audit reports, compliance reports, correspondence, or other records between the Village of Bourbonnais (or the Bourbonnais Police Department) and the Illinois Secretary of State's office related to the Secretary of State's 2025 audit of ALPR data-sharing compliance, the Flock Safety/CSP data-sharing investigation, or compliance with 625 ILCS 5/2-130.*

7. Flock Safety Audit Logs (Metadata Only) *1 Exports of the Flock Safety "Organization Audit" and "Network Audit" reports for the period of July 1, 2025 through the date this request is processed. These reports are available within the Flock system's Insights tab and document which agencies searched the Department's ALPR network and the stated reason for each search. I am requesting the audit metadata only (searching agency, date, reason field), not the underlying ALPR capture data or license plate numbers.*

8. Village Board and Committee Records *Minutes, agendas, memoranda, presentations, or staff reports from any Village Board meeting, committee meeting, or public safety committee meeting at which the acquisition, renewal, expansion, or oversight of the Flock Safety ALPR system was discussed. Please*



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provide responsive records in electronic format where available (PDF, CSV, native export).

LEGAL NOTE

None of the records requested above constitute ALPR capture data. These are administrative, contractual, financial, and oversight records documenting the Village's ALPR program operations. They are not "[i]nformation gathered or records created from the use of automatic license plate readers in connection with Section 2-130 of the Illinois Vehicle Code" (5 ILCS 140/7(1)(d-7)), and that exemption does not apply to any item in this request.

These categories of records have been successfully obtained from Illinois law enforcement agencies via FOIA. For example, the Illinois State Police produced 625 ILCS 5/2-130 compliance~ declarations in response to MuckRock FOIA Request No. 6221756. ALPR policies, contracts, and data-sharing lists are routinely produced by agencies across the state. All records in this request are subject to FOIA's presumption of disclosure. "All records in the custody or possession of a public body are presumed to be open to inspection or copying." 5 ILCS 140/1.2.

Response:

Your request is granted in part and denied in part.

1. ALPR/Flock Safety Usage Policy Request Granted. See provided information in link

2. Flock Safety Contract and Agreements Request granted in part and denied in part. See provided information in link.

Section 7(1)(b) of FOIA (5 ILCS 140/7(1)(b) (West 2016)) allows a public body to withhold "[p]rivate information, unless disclosure is required by another provision of this Act, a State or federal law or a court order." Section 2(c-5) of FOIA (5 ILCS 140/2(c-5) (West 2016)) defines "private information" as: unique identifiers, including a person's social security number, driver's license number, employee identification number, biometric identifiers, personal financial information, passwords or other access codes, medical records, home or personal telephone numbers, and personal email



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addresses. Private information also includes home address and personal license plates, except as otherwise provided by law or when compiled without possibility of attribution to any person.

3. Data-Sharing Agreements and Network Participation Request Granted See provided information in link

4. Data Retention Period. After a diligent search, the Village of Bourbonnais cannot locate any documents responsive to the portions of your request which asks for "records identifying the departments current retention period" in our custody. This is neither a rejection nor a denial of your request. To the extent you specifically asked for certain types of records and those records are not enclosed, that is because they do not exist at this time."

If you construe this response as a denial, per 5 ILCS 140/9, Section 9(a), you have a right to have the denial of your request reviewed by the Public Access Counselor (PAC) at the Office of the Illinois Attorney General. You can file your Request for Review with the PAC by writing to:

Public Access Counselor
Office of the Attorney General
500 South 2nd Street
Springfield, Illinois 62706
Fax: 217-782-1396
E-mail: Public.Access@ilag.gov

You also have the right to seek judicial review of your denial by filing a lawsuit in the State circuit court. 5 ILCS 140/11. If you choose to file a Request for Review with the PAC, you must do so within 60 calendar days of the date of this response/denial. 5 ILCS 140/9.5(a). Please note that you must include a copy of your original FOIA request and the denial/response letter when filing a Request for Review with the PAC.

5. Cost and Payment Records Request granted in part and denied in part. See provided information in link.

Section 7(1)(b) of FOIA (5 ILCS 140/7(1)(b) (West 2016)) allows a public body to withhold "[p]rivate information, unless disclosure is required by another provision of this Act, a State or federal law or a court order." Section 2(c-5) of FOIA (5 ILCS 140/2(c-5) (West 2016)) defines "private information" as: unique identifiers, including a person's social security number, driver's license number, employee identification number, biometric identifiers, personal financial information, passwords or other access codes, medical records, home or personal telephone numbers, and personal email



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6. Secretary of State ALPR Audit Records After a diligent search, the Village of Bourbonnais cannot locate any documents responsive to the portions of your request which asks for "secretary of state ALPR Audit Records" in our custody. This is neither a rejection nor a denial of your request. To the extent you specifically asked for certain types of records and those records are not enclosed, that is because they do not exist at this time."

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7. Flock Safety Audit Logs (Metadata Only) Request Granted See provided information in link

8. Village Board and Committee Records Request Granted See provided information in link. Please take note that pursuant to 5 ILCS 140/8.5(a) – A public body is not required to copy a public record that is published on the public body's website. I did go through and locate the records for you.

For future reference, this data can be located at
<https://go.boarddocs.com/il/vobil/Board.nsf/Public>

I would note that in this section, there are multiple agendas that do not mention the Flock System specifically, but the Flock System is referenced in a budget or payment schedule in the meeting. I hope this helps.



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The original FOIA request, response letter, and the file(s) responsive to your request can be accessed from this link : [26-2082 Stan Gromer](#)

**This medium was used due to the size of the request and an electronic response was requested*

If you should have any further questions or need help accessing the requested file(s), please feel free to contact the Village of Bourbonnais directly at the information below.

Once you have accessed the link you will find that the information you requested is numbered according to the section of your request.

You have a right to have the denial of your request reviewed by the Public Access Counselor (PAC) at the Office of the Illinois Attorney General. 5 ILCS 140/9.5(a). You can file your Request for Review with the PAC by writing to:

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Any further questions please feel free to contact me directly.

Jason Sztuba

FOIA Officer

Deputy Chief

sztubaj@villageofbourbonnais.com